

1 JULIA M. JAYNE (State Bar No. 202753)

E-Mail: *jjayne@campbelljayne.com*

2 CAMPBELL & JAYNE LLP

369 Pine Street, Suite 518

3 San Francisco, California 94104

Telephone: (415) 623-3600

4 Facsimile: (415) 623-3605

5 Attorneys for Defendant

STEPHEN GROSS

7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

Case No. CR 11-0250 RS

11 Plaintiff,

12 v.

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING
DATE**

13 STEPHEN GROSS

14 Defendant.

15
16 IT IS HEREBY STIPULATED by and between the parties hereto and their respective
17 undersigned counsel, and with the consent of Defendant Stephen Gross, that the hearing presently
18 scheduled for August 23, 2011 at 2:30 p.m. be taken off calendar and rescheduled for September
19 20, 2011 at 2:30 p.m.. The reason for this extension is that Defense counsel needs additional time
20 to review the recently-received discovery in this matter and confer with her client.

21 The Defense submits and the Government does not object that it is appropriate to exclude
22 time from August 23, 2011 though September 20, 2011, for effective preparation of the defense,
23 and because the ends of justice served by taking such action outweigh the best interest of the
24 public and the defendant in a speedy trial, taking into account the exercise of due diligence. 18
25 U.S.C. § 3161(h)(8)(A) and (B)(iv). The defense submits that it is further appropriate to exclude
26 time for availability and continuity of counsel, and because the ends of justice served by taking
27 such action outweigh the best interest of the public and the defendant in a speedy trial, taking into
28

1 account the exercise of due diligence. 18 U.S.C. § 3161(h)(8)(A) and (B)(iv). The United States
2 does not object to such an exclusion.

3
4
5 DATED: August 17, 2011

/jmj/
Julia Mezinsky Jayne
Counsel for STEPHEN GROSS

6
7
8 DATED: August 17, 2011


UNITED STATES ATTORNEY'S OFFICE

9
10 By: /s/ Kathryn Haun
KATHRYN HAUN
Attorneys for Plaintiff
UNITED STATES OF AMERICA

11
12
13
14
15 **ORDER**

16 **IT IS SO ORDERED.**

17
18
19
20 DATED: 8/19/11


HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT COURT JUDGE

LAW OFFICES
CAMPBELL & JAYNE LLP
369 PINE ST., SUITE 518
SAN FRANCISCO, CALIFORNIA 94104